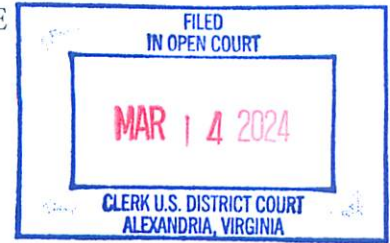


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Richmond Division



UNITED STATES OF AMERICA

v.

MUHAMMAD PAHLAWAN,
(Counts 1, 2)

MOHAMMAD MAZHAR,
(Count 3)

GHUFRUN ULLAH, and
(Counts 4, 5)

IZHAR MUHAMMAD.
(Count 6)

Defendants.

Criminal No. 3:24-CR- 00041 (DJN)

Maritime Transport Involving Weapons of Mass Destruction
18 U.S.C. §§ 2280a(a)(1)(B)(i), (b)(1)(B), (b)(1)(C)
(Count 1)

Providing Materially False Information to a Federal Law
Enforcement Officer During a Boarding of a Vessel
18 U.S.C. § 2237(a)(2)(B)
(Counts 2-6)

INDICTMENT

March 2024 Term – at Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Maritime Transport Involving Weapons of Mass Destruction)

From a date unknown, but at least since on or about January 1, 2024, and continuing thereafter up to and including January 11, 2024, in offenses committed outside of the jurisdiction of any particular State or district of the United States, the defendant MUHAMMAD PAHLAWAN, who was later found in the United States after such activity was committed, and who was first brought to the Eastern District of Virginia, did intentionally and unlawfully transport on board a ship an explosive material, knowing that it was intended to be used to cause, or in a threat to cause, death to any person or serious injury or damage for the purpose of intimidating a population, or compelling a government or an international organization to do or

to abstain from doing any act, and during the commission of such activity, a national of the United States was killed.

(In violation of Title 18, United States Code, Sections 2280a(a)(1)(B)(i), (b)(1)(B), and (b)(1)(C)).

COUNT TWO

(Providing Materially False Information to a Federal Law Enforcement Officer During a Boarding of a Vessel)

From on or about January 11, 2024, and continuing through on or about January 13, 2024, in offenses committed outside of the jurisdiction of any particular State or district of the United States, the defendant MUHAMMAD PAHLAWAN, who was first brought to the Eastern District of Virginia, knowingly provided materially false information to a Federal law enforcement officer during a boarding of a vessel regarding the vessel's destination, origin, ownership, registration, nationality, cargo, or crew—to wit, MUHAMMAD PAHLAWAN provided materially false statements regarding the identity of the vessel's captain—while on board a vessel subject to the jurisdiction of the United States.

(In violation of Title 18 United States Code, Section 2237(a)(2)(B)).

COUNT THREE

(Providing Materially False Information to a Federal Law Enforcement Officer During a Boarding of a Vessel)

From on or about January 11, 2024, and continuing through on or about January 13, 2024, in offenses committed outside of the jurisdiction of any particular State or district of the United States, the defendant MOHAMMAD MAZHAR, who was first brought to the Eastern District of Virginia, knowingly provided materially false information to a Federal law enforcement officer during a boarding of a vessel regarding the vessel's destination, origin, ownership, registration, nationality, cargo, or crew—to wit, MOHAMMAD MAZHAR provided

materially false statements regarding the identity of the vessel's captain—while on board a vessel subject to the jurisdiction of the United States.

(In violation of Title 18 United States Code, Section 2237(a)(2)(B)).

COUNT FOUR

(Providing Materially False Information to a Federal Law Enforcement Officer During a Boarding of a Vessel)

From on or about January 11, 2024, and continuing through on or about January 13, 2024, in offenses committed outside of the jurisdiction of any particular State or district of the United States, the defendant GHUFRAN ULLAH, who was first brought to the Eastern District of Virginia, knowingly provided materially false information to a Federal law enforcement officer during a boarding of a vessel regarding the vessel's destination, origin, ownership, registration, nationality, cargo, or crew— to wit, GHUFRAN ULLAH provided materially false statements regarding the identity of the vessel's captain—while on board a vessel subject to the jurisdiction of the United States.

(In violation of Title 18 United States Code, Section 2237(a)(2)(B)).

COUNT FIVE

(Providing Materially False Information to a Federal Law Enforcement Officer During a Boarding of a Vessel)

From on or about January 11, 2024, and continuing through on or about January 13, 2024, in offenses committed outside of the jurisdiction of any particular State or district of the United States, the defendant GHUFRAN ULLAH, who was first brought to the Eastern District of Virginia, knowingly provided materially false information to a Federal law enforcement officer during a boarding of a vessel regarding the vessel's destination, origin, ownership, registration, nationality, cargo, or crew— to wit, GHUFRAN ULLAH provided materially false

statements regarding the origin of the vessel's voyage—while on board a vessel subject to the jurisdiction of the United States.

(In violation of Title 18 United States Code, Section 2237(a)(2)(B)).

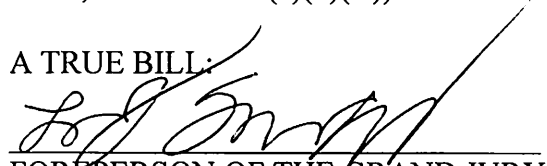
COUNT SIX

(Providing Materially False Information to a Federal Law Enforcement Officer During a Boarding of a Vessel)

From on or about January 11, 2024, and continuing through on or about January 13, 2024, in offenses committed outside of the jurisdiction of any particular State or district of the United States, the defendant IZHAR MUHAMMAD, who was first brought to the Eastern District of Virginia, knowingly provided materially false information to a Federal law enforcement officer during a boarding of a vessel regarding the vessel's destination, origin, ownership, registration, nationality, cargo, or crew—to wit, IZHAR MUHAMMAD provided materially false statements regarding the vessel's cargo—while on board a vessel subject to the jurisdiction of the United States.

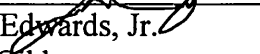
(In violation of Title 18 United States Code, Section 2237(a)(2)(B)).

A TRUE BILL:


FOREPERSON OF THE GRAND JURY

JESSICA D. ABER
UNITED STATES ATTORNEY

By:


Troy A. Edwards, Jr.
John T. Gibbs
Gavin R. Tisdale
Assistant United States Attorneys

Lesley Woods
Trial Attorney, Counterterrorism Section

No.: 3:24-CR-

UNITED STATES DISTRICT COURT

Eastern District of Virginia

Alexandria Division

THE UNITED STATES OF AMERICA

v.

MUHAMMAD PAHLAWAN,
MOHAMMAD MAZHAR,
GHUFRUN ULLAH, and
IZHAR MUHAMMAD

INDICTMENT

Count 1: Maritime Transport Involving Weapons of Mass Destruction, in violation of 18 U.S.C. §§ 2280a(a)(1)(B)(i), (b)(1)(B), (b)(1)(C)
Count 2-6: Providing Materially False Information to a Federal Law Enforcement Officer During a Boarding of a Vessel, in violation of 18 U.S.C. §
2237(a)(2)(B)

A true bill

Foreman

Filed in open court this 14th day,
of March A.D. 20 24

Clerk

Bail, \$